

**SEEGERWEISS**<sub>LLP</sub>  
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March 27, 2025

**VIA ECF**

Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State St.  
Trenton, NJ 08608

**Re: *In re: Insulin Pricing Litigation, No. 2:23-md-03080-BRM-RLS*  
MDL No. 3080 | Custodian Update**

Dear Judge Singh:

I write on behalf of Plaintiffs and Defendants Express Scripts, Inc., Medco Health Solutions, Inc., and Express Scripts Administrators, LLC (collectively, “Express Scripts”) pursuant to the Court’s directive at the March 11, 2025 discovery conference to update the Court five days after the parties met and conferred. The parties held such a conference regarding custodian proposals on March 20, 2025. Plaintiffs provided a written follow-up to that conferral on March 21, 2025. The parties continue discuss the matters addressed during the meet-and-confer and in their subsequent correspondence and propose to update the Court no later than April 4, 2025, either by joint submission or simultaneous position statements. If that approach is acceptable, we respectfully request that you indicate the Court’s approval by so ordering this letter.

We thank the Court for its continuing attention to this matter.

Respectfully submitted,

s/ David R. Buchanan  
David R. Buchanan

**cc: Honorable Brian R. Martinotti, U.S.D.J.  
All Counsel of Record**

SO ORDERED:

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Hon. Rukhsanah L. Singh, U.S.M.J.